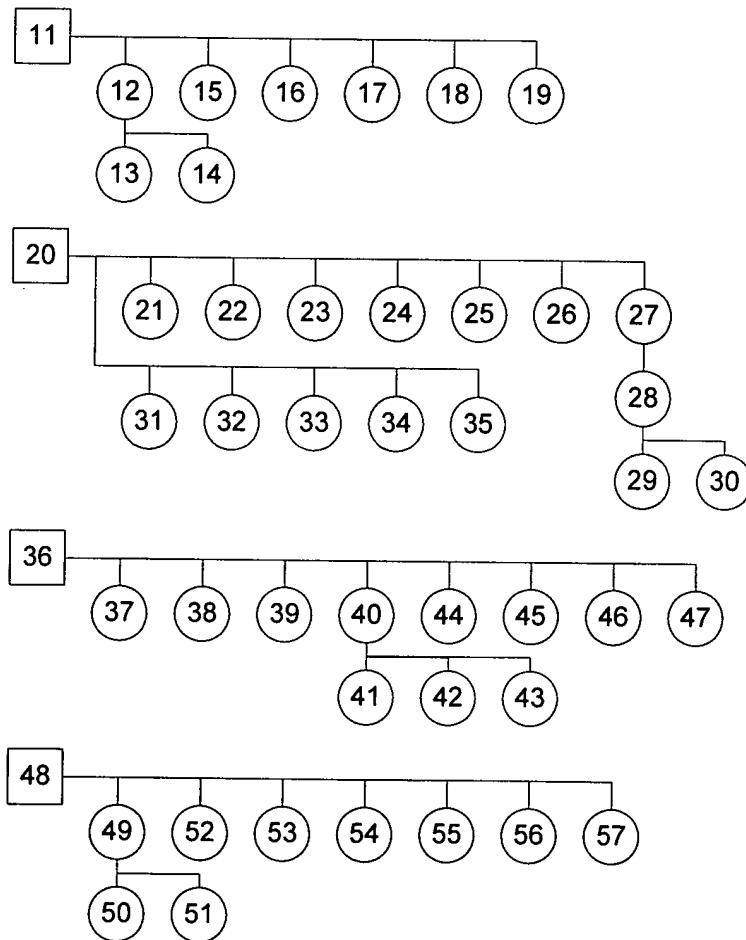


REMARKS

Reconsideration of the application is respectfully requested. A final Office action mailed August 25, 2003 is pending in the application. Applicants have carefully considered the Office action and the references of record. In the Office action, claims 11-24, 26-37, 39-51 and 53-57 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,893,911 to Piskiel et al. ("Piskiel et al.") in view of U.S. Patent No. 5,881,315 to Cohen ("Cohen"), and claims 25 and 38 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Piskiel et al. in view of Cohen, and further in view of U.S. Patent No. 5,630,127 to Moore et al. ("Moore et al."). In this response to the Office action, claims 11, 12, 16, 17, 20, 27, 31, 32, 36, 40, 44, 45, 48, 49, 52-56 have been amended. Therefore, claims 11-57 are pending in the application. The following diagram depicts the relationship between the independent and dependent claims.



Claim Rejections Under 35 U.S.C. § 103

An issue in the rejections under 35 U.S.C. § 103 is the nature of a trigger structure as set forth and claimed by the present application. Each claimed trigger has one or more rules, each claimed rule specifies a condition as well as an action, and the action specified by each rule is capable of being different. Claim 11, for example, explicitly claims these aspects of the trigger structure.

each trigger comprises at least one rule, each rule, at least, specifies a condition and specifies an action, and the action specified by each rule is capable of being different for each rule;

(claim 11, as amended).

Piskiel et al. does not teach such a trigger. Cohen is cited by the Office action as teaching a trigger in accordance with the claimed invention, but in fact, Cohen teaches an event filter group. An event filter group is described by Cohen as a collection of one or more event filters.

An event filter group is a collection of one or more "event filters."

(Cohen, col. 6, lines 59-60). Even if an event filter is called a condition for purposes of applying the teachings of the Cohen reference to the claims, an event filter is not the same as a rule. Each claimed rule specifies a condition and specifies an action, and the action specified by each rule is capable of being different for each rule. Further, it is the action specified by the rule that is performed upon determining that the condition specified by the rule is satisfied. This is explicitly claimed, for example, by claim 11.

upon determining that the condition specified by the rule is satisfied ...  
performing the action specified by the rule.

(claim 11, as amended, emphasis added).

The event filter taught by Cohen does not specify a condition and specify an action, in particular an action that is capable of being different for each event filter. Therefore, when applied to the claims, the event filter taught by Cohen is not a rule. Because an event filter is not a rule, it follows that an event filter group is not a trigger for purposes of applying Cohen to the claims. That is, Cohen also does not teach a trigger in accordance with the claimed invention. Thus, neither Piskiel et al. nor Cohen, separately or in combination, teaches or suggests all of the limitations of the independent claims 11, 20, 36

or 48. However, MPEP § 2143.03 requires that the prior art teach or suggest all of the limitations of a claim.

All the claim limitations must be taught or suggested by the prior art.  
(MPEP § 2143.03, emphasis added).

For at least these reasons, independent claims 11, 20, 36 and 48 are patentable over Piskiel et al. in view of Cohen.

#### Remaining Claims

Each of claims 11, 20, 36 and 48 is in independent form, whereas all of the remaining claims depend directly or indirectly on one of these four independent claims. Some of the dependent claims, for example, claims 52, 54 and 56, have been amended to more particularly point out and distinctly claim the invention as described by the specification. In compliance with 37 C.F.R. § 1.121(f), the amendments do not add new matter.

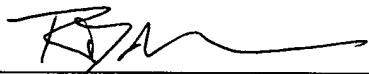
The dependent claims are allowable for at least the same reasons that the four independent claims 11, 20, 36 and 48 are allowable in that the dependent claims incorporate the features of the independent claims. Nevertheless, the dependent claims further define subject matter not shown or rendered obvious by the prior art of record.

#### CONCLUSION

The application is considered in good and proper form for allowance, and the examiner is respectfully requested to pass this application to issue. If, in the opinion of the examiner, a telephone conference would expedite the prosecution of the subject application, the examiner is invited to call the undersigned attorney.

In re Application of CARON et al.  
Application No. 09/504,531

Respectfully submitted,



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